



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

JUN 15 2006 (6)

Re: **Bridgeman & Russell Building, 10-12 & 14-16 W. 1st Street, Duluth, Minnesota**

Project Number: **16915**

Taxpayer's Identification Number:

Dear

My administrative review of the decision of Technical Preservation Services, National Park Service, denying certification of the rehabilitation of the property cited above is concluded. The review was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I want to thank your representatives,

_____ for meeting with me in Washington on May 16, 2006, and for the information that they provided during the meeting.

After careful review of the complete record for this project, I have determined that the rehabilitation of the Bridgeman & Russell Building is not consistent with the historic character of the property and that the project does not meet Standard 6 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on December 21, 2005, by Technical Preservation Services, is hereby affirmed. However, I have further determined that the project could be brought into conformance with the Standards, and thereby be certified, if the corrective measures described below are undertaken.

The Bridgeman & Russell Building, at 10-12 & 14-16 W. 1st Street, was constructed in 1905 and 1907 as a three-story mixed use structure for a dairy company. The building features masonry walls with a ground floor storefront, one-over-one windows, narrow mortar joints, and brownstone sills and decorative hoods on the primary facade. Interior floors were supported on wood columns and joists. On March 30, 2004 the National Park Service determined that the Bridgeman & Russell Building appears to contribute to a potential historic district that is in the process of being established in downtown Duluth.

The rehabilitation of the Bridgeman & Russell Building proposed converting the structure for use as residential apartments. Proposed work included cleaning the exterior brick, selective repointing, and other masonry repairs, installing a new storefront on the main facade, replacing all existing windows, removing elements of the interior system of

drawings) based on the guidance above that would retain the historic character of the Bridgeman & Russell main facade.

Regarding the repointing of exterior brick, I understand that this work has yet to be undertaken. However, the main facade of the building features a high degree of masonry craftsmanship and distinctive material, the appearance of which must be retained when selective hand repointing work is eventually undertaken. Should you wish to proceed with this application please verify that the proposed repointing mixture is consistent with the surviving historic mortar in appearance and strength. This can be achieved by submitting the specifications of the proposed mix along with the results of a mortar analysis prior to undertaking the work. Part 3 documentation should include photographs confirming that the overall amount of repointing was limited, and that the color of the new mortar, width of the masonry joint, and joint profile on all repointed areas are consistent with the building's historic appearance.

Regarding the application of masonry sealants, I understand that sealants will be limited to filling existing cracks that have developed along historic brownstone sills, lintels, and other masonry features. Such a limited application will be in keeping with the Standards

Regarding the replacement windows, TPS again cited a lack of information concerning the proposed window treatment. Windows are important character-defining features, and preserving existing windows is an important aspect of meeting the Standards. The need to replace existing historic windows should be substantiated with a complete window survey. The goal of an historic window survey is to document, categorize, and evaluate each existing window to determine the extent of work required to rehabilitate and reuse existing windows. The information that you provided during the application process and at the May 16, 2006, administrative review meeting is marginally sufficient to confirm the deteriorated condition of the historic units and the need to replace them. Because the surviving units were beyond repair, because the replacement windows adequately replicate the historic units, and because they were installed in the same position within the window frame as the historic units, I find that the new windows are in keeping with the Standards.

Regarding removal of historic material from the building interior, there were three primary concerns about the interior that TPS expressed in its December 21, 2005, decision letter: removal of elements of the surviving structural system, removal of historic trim and other wood elements, and removal of historic plaster wall finishes. I agree with TPS that the loss of the structural members as well as the limited amount of surviving trim has had a negative impact on the character of this building's interior space. However, the degree of deterioration of the interior renders the removal of these features unfortunate, but, in this case, acceptable.

While surviving interior plaster was also significantly deteriorated, the proposal to leave wall surfaces exposed as bare, unpainted brick that were previously finished, is not in keeping with the building's character and is contrary to Standard 6 (cited above). If you choose to continue with this application, all wall areas that were finished with either paint

or plaster historically, must be covered with a like material. From the photographs contained in the files and from our conversation on May 16, 2006, I understand that all of the interior walls in the east half of the building and the ground floor of the west half at some time during the proposed period of significance had a plaster finish. If the wall finish in these areas is deteriorated beyond repair or missing, the walls may be covered with new drywall consistent with the historic appearance of the plaster. Photographic evidence contained within the file indicates that walls on the second and third floors on the west side of the building featured exposed brick covered with white paint. To suggest the more unfinished character of this space, walls in these areas should not be covered with drywall, but rather the brick should remain exposed and painted. If there are historic photographs or other evidence suggesting that the walls featured a different finish historically from what I have specified herein, please submit such materials for my review prior to undertaking work on the walls. Photographs showing the work completed as described above, that are keyed to a plan for each floor must accompany a Part 3 application.

Lastly, I would like to address the marginal level of information submitted as part of the Part 2 for this project. Considerable delay and confusion (along with the time and expense incurred as a result) could have been avoided had sufficient documentation been included with the initial application. Complete photographic documentation of preexisting conditions is required by the State Historic Preservation Office (SHPO) and by TPS. I also remind you that applicants that proceed with rehabilitation work before receiving approval for such work by both the SHPO and the NPS do so at their own risk [36 CFR 67.6]. A complete application, full consultation, and approval of proposed plans before work is undertaken are essential to timely review and a successful project.

If you choose to continue this application and submit a revised storefront proposal, as well as appropriate materials relating to mortar mixtures and wall finishes, please forward them for my consideration through Technical Preservation Services, National Park Service,

Although the project will meet the Secretary of the Interior's Standards for Rehabilitation if completed in accordance with the requirements listed above, the rehabilitation will not become a "certified rehabilitation" eligible for the tax incentives until it is completed and so designated. A prerequisite for such designation is that the district must be listed in the National Register of Historic Places. As of this writing, the district is not yet listed in the National Register, and I advise you to proceed with the listing process as expeditiously as possible. If you have any questions about this process, you should consult with the National Register staff of the State Historic Preservation Office. Also note that any further changes to this project unrelated to the issues that were of concern during the administrative review should be submitted as an amendment to Technical Preservation Services, National Park Service, If you have any other questions concerning the administrative review process, feel free to contact

A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Burns", is written over a light blue rectangular background.

John A. Burns, FAIA
Chief Appeals Officer, Cultural Resources

cc

SHPO- MN